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15 UNITED STATES DISTRICT COURT  
16 CENTRAL DISTRICT OF CALIFORNIA

17 SECURITIES AND EXCHANGE  
18 COMMISSION,

19 Plaintiff,

20 v.

21 ROBERT YANG, et al.,

22 Defendants,

23 YANROB'S MEDICAL, INC., et al.,

24 Relief Defendants.

Case No. 5:15-CV-02387-SVW (KKx)

**NOTICE OF SUBMISSION AND  
MOTION FOR APPROVAL OF  
SIXTH INTERIM APPLICATION  
FOR PAYMENT OF FEES AND  
REIMBURSEMENT OF EXPENSES  
OF RECEIVER AND HIS  
PROFESSIONALS**

[Memorandum of Points and Authorities;  
Sixth Interim Application of Receiver and  
His Professionals; Declaration of Stephen  
J. Donell; and [Proposed] Order  
submitted concurrently herewith]

Date: January 7, 2019

Time: 1:30 p.m.

Ctrm: 10A

Judge: Hon. Stephen V. Wilson

**TO ALL INTERESTED PARTIES AND THIS HONORABLE COURT:**

**PLEASE TAKE NOTICE THAT** on January 7, 2019 at 1:30 p.m., or as  
soon thereafter as this matter may be heard in Courtroom 10A of the above-entitled  
Court, located at 350 W. 1st Street, 10th Flr., Los Angeles, California 90012,  
Stephen J. Donell, (the "Receiver") as the permanent receiver for Defendants Suncor  
Fontana, LLC, Suncor Hesperia, LLC, Suncor Care Lynwood, LLC, and their

1 respective subsidiaries and affiliates, will and hereby does move this Court for an  
 2 Order granting the Sixth Interim Application for Payment of Fees and  
 3 Reimbursement of Expenses (the "Application") of the Receiver, his accountants,  
 4 SL Biggs, a Division of Singer Lewak ("SL Biggs"), and his counsel of record,  
 5 Allen Matkins Leck Gamble Mallory & Natsis LLP ("Allen Matkins" or  
 6 "Professionals").

7 The Application of the Receiver and Allen Matkins has been submitted  
 8 concurrently herewith. Pursuant to the Application, the Receiver, Allen Matkins  
 9 and SL Biggs seek approval of all of their respective fees and expenses incurred  
 10 from April 1, 2017 through July 31, 2018, as follows:

<u>Applicant</u>	<u>Current Fees</u>	<u>Current Expenses</u>	<u>Total Amount Requested for Approval</u>
Receiver	\$107,177.08	\$403.45	\$107,580.53
Allen Matkins	\$322,341.40	\$5,550.98	\$327,892.38
SL Biggs	\$1,440.00	0	\$1,440.00
<b><u>TOTAL:</u></b>	\$430,958.48	\$5,954.43	\$436,912.91

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 18 Pursuant to the Application, the Receiver seeks authorization to pay himself  
 19 90% of the approved fees and 100% of the approved expenses from the assets of the  
 20 Receivership Entities, on an interim basis. Additionally, the Receiver seeks  
 21 authorization to pay Allen Matkins 80% of the approved fees and 100% of the  
 22 approved expenses from the assets of the Receivership Entities, on an interim basis.  
 23 Finally, the Receiver seeks authorization to pay SL Biggs 100% of its fees which  
 24 arose in connection with accounting services and the sale of one real property Asset.

25 The Application is based on this Notice of Submission and Motion for  
 26 Approval of Sixth Interim Application for Payment of Fees and Reimbursement of  
 27 Expenses, the Application itself, as well as the concurrently filed Memorandum of  
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1 Points and Authorities, and Declaration of Stephen J. Donell, along with any  
2 argument or evidence presented to the Court at the hearing on this Motion.

3 Please also note that the Receiver's and Allen Matkins' First Interim  
4 Applications for Payment of Fees and Reimbursement of Expenses (the "Original  
5 Applications"), which covered the period from December 2015 through March  
6 2016, were filed on June 3, 2016, and heard on July 11, 2016, and the Second  
7 Interim Applications for Payments of Fees and Reimbursement of Expenses (the  
8 "Second Applications"), which covered the period from April 1, 2016 through June  
9 30, 2016, were filed on October 7, 2017 and the hearing was vacated. The order on  
10 the Second Applications was entered on November 3, 2016, and the order granting  
11 the First Applications was entered on November 8, 2016. The Third Interim  
12 Applications for Payment of Fees and Reimbursement of Expenses (the "Third  
13 Applications"), which covered the period from July 1, 2016 through September 30,  
14 2016 was filed on January 11, 2017, and the order granting the Third Applications  
15 was entered on February 16, 2017. The Fourth Interim Applications for Payment of  
16 Fees and Reimbursement of Expenses (the "Fourth Applications"), which covered  
17 the period from October 1, 2016 through December 31, 2016 was filed on June 7,  
18 2017, and the order granting the Fourth Applications was entered on June 22, 2017.  
19 The Fifth Interim Applications for Payment of Fees and Reimbursement of  
20 Expenses (the "Fifth Applications"), which covered the period from January 1, 2017

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1 through March 31, 2017 was filed on December 19, 2017, and the order granting the  
2 Fifth Applications was entered on January 29, 2018.

3 Dated: November 19, 2018

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9 By:           /s/          Joshua A. del Castillo          

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